

THE HONORABLE RONALD B. LEIGHTON

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

HIDDEN HILLS MANAGEMENT, LLC,
and 334TH PLACE 2001, LLC,

Plaintiffs,

v.

AMTAX HOLDINGS 114, LLC, and
AMTAX HOLDINGS 169, LLC,

Defendants.

No. 3:17-cv-06048-RBL

DECLARATION OF J. SCOTT
PRITCHARD REGARDING FEES AND
COSTS FOR CONTINUED RULE 30(B)(6)
DEPOSITION OF AMTAX 169, LLC

NOTE ON MOTION CALENDAR: August
23, 2019

AMTAX HOLDINGS 114, LLC, AMTAX
HOLDINGS 169, LLC, and PARKWAY
APARTMENTS, LP

Counter-Plaintiffs,

v.

HIDDEN HILLS MANAGEMENT, LLC,
and 334TH PLACE 2001, LLC,

Counter-Defendants.

I, J. Scott Pritchard, declare as follows:

1. I am one of the attorneys for Plaintiffs and Counter-Defendants Hidden Hills
Management, LLC, and 334th Place 2001, LLC (“Plaintiffs”) in the above-captioned matter, and

DECLARATION OF J. SCOTT PRITCHARD REGARDING
FEES AND COSTS FOR CONTINUED RULE 30(B)(6)
DEPOSITION OF AMTAX 169, LLC (Case No. 17-cv-06048-RBL) - 1

102756512.1 0009368-00002

STOEL RIVES LLP
ATTORNEYS
600 University Street, Suite 3600, Seattle, WA 98101
Telephone 206.624.0900

I make this declaration based upon personal knowledge of the work performed in this case and my review of my law firm's billing records.

2. Plaintiffs filed a motion to compel in the case, which was granted by order of the Court dated December 28, 2018 (the "Sanctions Order"). A true and correct copy of the Sanctions Order is attached hereto as **Exhibit A**. It provided that "pursuant to Federal Rule of Civil Procedure 37(d), 334th Place's reasonable expenses, including its attorneys' fees and costs, incurred to prepare for and hold the continued Rule 30(b)(6) deposition of Amtax 169 will be paid for by Amtax 169."

3. 334th Place 2001, LLC seeks the fees and costs detailed in the chart below. This is the amount 334th Place 2001, LLC incurred between December 28, 2018 (the date of the Order) and January 24, 2019 (the date of the deposition) in labor costs and other fees for the continued Rule 30(b)(6) deposition of AMTAX Holdings 169, LLC ("AMTAX 169").

334 TH Place 2001, LLC's Fees and Costs	
Attorneys	\$16,730.00
Paralegals	\$4,917.00
Costs	\$5,407.91
Total:	\$27,054.91

4. Stoel Rives attorneys' fee arrangement with 334th Place 2001, LLC is to bill for work performed on an hourly basis, subject to appropriate adjustments in accordance with the Rules of Professional Conduct § 1.5. Rita Latsinova and I performed most of the work subject to the Court's order. My billing rate is \$390 and Rita Latsinova's billing rate is \$525. We received some assistance from a few other attorneys, paralegal Angela Lewis, and other non-attorney staff members. I am generally familiar with billing rates at firms comparable to Stoel Rives in Seattle

1 and these rates charged are within the range of billing rates for attorneys with similar expertise
2 and experience in the Seattle area.

3 5. Attached hereto as **Exhibit B** are copies of the relevant excerpts from our billing
4 statements, showing the work performed and the aggregate time spent in connection with the
5 continued Rule 30(b)(6) deposition of AMTAX 169 from the date of the Court's Sanctions Order
6 through the date of the deposition, redacted for attorney-client privilege. We made every effort
7 to seek only those fees and costs that were associated with the preparation for and taking of the
8 continued Rule 30(b)(6) deposition of AMTAX 169. Attached hereto as **Exhibit C** is a table
9 showing costs incurred with supporting receipts.

10 6. It is the practice of Stoel Rives to bill certain costs separately to the client. Costs
11 which are billed separately include photocopy charges, long distance cell phone services,
12 computerized research, charges for outgoing telecopies, filing fees, witness fees, costs for
13 messenger services, etc. This law firm will also, from time-to-time, advance and pay certain
14 costs such as court reporter's fees and transcript costs. These costs are also sometimes billed
15 directly to the client and paid by them. These are billing practices that are standard in the legal
16 community.

17 I declare under penalty of perjury of the laws of the United States of America and of the
18 State of Washington that the foregoing is true and correct.

1 DATED: August 7, 2019.

2 STOEL RIVES LLP

3
4 /s/ J. Scott Pritchard

5 J. Scott Pritchard, WSBA #50761

6 600 University Street, Suite 3600

7 Seattle, WA 98101

8 Telephone: (206) 624-0900

9 Email: scott.pritchard@stoel.com

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

DECLARATION OF J. SCOTT PRITCHARD REGARDING
FEES AND COSTS FOR CONTINUED RULE 30(B)(6)
DEPOSITION OF AMTAX 169, LLC (Case No. 17-cv-06048-RBL) - 4

102756512.1 0009368-00002

STOEL RIVES LLP
ATTORNEYS
600 University Street, Suite 3600, Seattle, WA 98101
Telephone 206.624.0900

CERTIFICATE OF SERVICE

I hereby certify that on the ___ day of August 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following participants:

Arwen Johnson	ajohnson@bsfllp.com
Christopher Cadwell	ccaldwell@bsfllp.com BSF_LAD_Records@BSFLLP.com
Craig Bessenger	cbessenger@bsfllp
Eric Pettit	epettit@bsfllp.com
Grace Zelphin	gzelphin@bsfllp.com
David Burman	dburman@perkinscoie.com docketsea@perkinscoie.com
Mallory Gitt Webster	mwebster@perkinscoie.com
Steven Merriman	smerriman@perkinscoie.com
David Goodnight	drgoodnight@stoel.com sea_PS@stoel.com docketclerk@stoel.com Adina.davis@stoel.com
Margarita Latsinova	rvlatsinova@stoel.com debbie.dern@stoel.com
J. Scott Pritchard	scott.pritchard@stoel.com eileen.mccarty@stoel.com

DATED: August 7, 2019.

s/ Eileen McCarty

Eileen McCarty
Practice Assistant
Stoel Rives LLP

CERTIFICATE OF SERVICE 1